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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

SPECTACULAR SOLAR CORP.

Debtor.

Chapter 11

Case No. 22-18522 (CMG)

Honorable Christine M. Gravelle

**SUPPLEMENTAL RESPONSE OF CREDITOR, SHAKTI GROUP USA,
TO DEBTOR'S CHAPTER 11 PLAN OF REORGANIZATION**

Creditor, Shakti Group USA ("Shakti"), by and through its undersigned counsel, by way of supplemental response to confirmation of the proposed modified Chapter 11 Plan (the "Plan") (Doc. 46) of Spectacular Solar Corp. (the "Debtor"), respectfully states as follows:

1. On October 27, 2022, the Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code. (Doc. 1).
2. On January 25, 2023, the Debtor filed its Chapter 11 Small Business Subchapter V Plan. (Doc. 32).
3. On February 14, 2023, the Debtor filed its Modified Small Business Debtor's Plan. (Doc. 46).
4. On March 7, 2023, this firm filed a notice of appearance on behalf of Shakti in the Debtor's bankruptcy case. (Doc. 51).
5. On March 20, 2023, this firm, on behalf of Shakti, filed a response to Debtor's Plan. (Doc. 61).

6. On March 23, 2023, Shakti filed its proof of claim. See Claim 17-1. The claim related to panels and inverters purchased by Shakti but not yet received from the Debtor and for work not completed. The claim amount is unknown. Shakti is currently procuring a quote for the work to be performed.

RESPONSE

7. As noted, Shakti purchased solar panels and inverters from the Debtor. Shakti received the panels; however, it is still waiting to receive inverters.

8. The Debtor performed services to repair Shakti's roof. The work performed by the Debtor was substandard and needs to be redone. Thus, Shakti has a damage claim against the Debtor for poor workmanship. The value of the damage claim is unknown and subject to a repair quote currently being procured by Shakti.

9. Shakti reserves any and all rights to assert a claim depending on the amount owed after determining value of the inverters and the damage claim for roof repairs. Thus, Shakti reserves its rights to fix its claim.

10. Based upon the foregoing, Shakti files this supplemental response to confirmation of the Debtor's Plan.

11. Shakti reserves its right to raise additional responses at the confirmation hearing as information develops including receipt of the inverters.

Respectfully submitted,

McMANIMON SCOTLAND & BAUMANN, LLC
Attorneys for Creditor, Shakti Group USA

Dated: April 18, 2023

By: /s/ Sari B. Placona
SARI B. PLACONA